

**INTEGRATIVE THERAPEUTICS INC."**NF Formulas PhytoPharmica
Tyler Encapsulations Vitaline Formulas

9755 SW Commerce Circle, Suite B2

Wilsonville, OR 97070

P: 503.582.8386 F: 503.582.0467

ENZYMATIC THERAPY***&
PHYTOPHARMICA***

825 Challenger Drive, Green Bay, WI 54311-8328

P: 920.469.1313 F: 888.570.6460 (Enzymatic)

P: 920.469.9099 F: 920.469.4418 (Phyto)

ENZYMATIC THERAPY*What **Better** feels like™*

January 16, 2006

Office of Nutritional Products, Labeling &
Dietary Supplements, HFS 810
Center for Food Safety and Applied Nutrition
Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740

RE: Label Claims/Disclaimers

Dear Sir or Madam:

This letter is to notify you that the following product is Manufactured, Packed, and/or Distributed by Enzymatic Therapy, Inc. at 825 Challenger Drive, Green Bay, Wisconsin 54311 has a label that contains a statement provided by section 403(r)(6) of the Federal Food, Drug and Cosmetic Act. Enzymatic Therapy, Inc. wishes to take advantage of the exemption to section 201(g)(1)(C) of the act and comply with section 403(r)(6) of the act. These claims are not necessarily for a product we currently market or plan to market in the immediate future, and may be exploratory in nature.

<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Mega MultiVitamin Drink Mix	High potency antioxidants for healthy aging.*	Vitamin A (50% as beta carotene and 50% retinyl acetate), Vitamin C (ascorbic acid), Vitamin D (as cholecalciferol), Vitamin E (as d-a-tocopheryl acetate), Thiamin (as thiamin HCl) (vitamin B1), Riboflavin (vitamin B2), Niacin (as niacinamide), Vitamin B6 (Pyridoxine HCl), Folic Acid, Vitamin B12, (as cyanocobalamin), Biotin, Pantothenic Acid (as calcium d-pantothenate), Calcium (as calcium lactate), Iodine (as potassium iodide), Magnesium (as magnesium glycinate), Zinc (as zinc sulfate), Selenium (as L-selenomethionine), Copper (as copper gluconate), Manganese (as manganese citrate), Chromium (as chromium picolinate), Molybdenum (as sodium molybdate), Sodium, Potassium (from whey protein, guar gum, potassium citrate and potassium iodide), Whey Protein, Malic Acid, Betaine, Inositol, Inulin (from chicory root), Hesperidin 50% (from citrus fruits), Taurine, Glycine, L-Tyrosine, N-Acetylcysteine (NAC), L-Serine, Stevia (Stevia rebaudiana) Leaf Extract, Sweet Cherry (Prunus cerasus) Fruit Extract, Cranberry (Vaccinium macrocarpon) Fruit Extract, Bilberry (Vaccinium myrtillus) Fruit Extract, Boron (sodium boron), Lutein (from Calendula officinalis), Zeaxanthin (from Calendula officinalis)

I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

By: Robert C. Doster

Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 1-16-06

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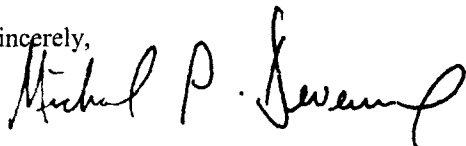
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Mega MultiVitamin Drink Mix 61c

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs, at (920) 406-3608.

Sincerely,

A handwritten signature in black ink, reading "Michael P. Devereux". The signature is fluid and cursive, with the first name "Michael" being the most prominent.

Michael P. Devereux
Chief Operations Officer



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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Mega MultiVitamin Drink Mix	NAC enhances performance in well-trained athletes by supporting muscle cysteine and GSH availability.*	N-Acetylcysteine (NAC)

I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

By: _____

Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 1-16-06

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs, at (920) 406-3608.

Sincerely,

Michael P. Devereux
Chief Operations Officer